

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

Mail Processing Network  
Rationalization Service Changes, 2012

Docket No. N2012-1

PUBLIC REPRESENTATIVE'S SECOND SET  
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO  
UNITED STATES POSTAL SERVICE WITNESS WILLIAMS (PR/USPS-T1: 5-7)

(April 3, 2012)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for  
Docket No. N2012-1

901 New York Ave, N.W. STE 200  
Washington, DC 20268-0001  
(202) 789-6889; Fax (202) 789-6891  
[christopher.laver@prc.gov](mailto:christopher.laver@prc.gov)

**PR/USPS-T-1-5**

Please refer to page 5 of your testimony where you describe the objective of the modeling exercise as “to determine whether excess capacity could be reduced significantly within the network if service obligations and operating constraints driven by current overnight First-Class Mail service standards were changed.”

- a. Why was this modeling exercise directed at assessing the cost consequences of service standards reductions for First Class Mail?
- b. Have similar analyses of the potential for cost reductions been directed at other mail classes?
- c. If yes, which other mail classes?

**PR/USPS-T-1-6**

Please refer to page 10 of your testimony where you state that, of the 251 Processing and Distribution Centers/Facilities, some 200 of those centers will remain. Please provide data on the mix of mail handled by centers/facilities that are staying open versus those that are closing. If final selection of locations to close has not yet determined; please provide the data for a likely or representative set of plants likely to remain open and plants likely to be closed.

**PR/USPS-T-1-7**

Please list the revenues and piece count by category of mail and by service standard within that category. Thus, for First-Class Mail, please report revenue and piece count for the portion of First-Class Mail that moved on origin/destination combinations that have a one day service standard, for the portion where the standard is two days, and for the portion where the standard is three days. Please provide this data for each category of mail for which service standards are proposed to change.